

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**HAYDEN GATEWAY LLC and  
BLOC DISPENSARY LLC,**

**Plaintiffs,**

**v.**

**ADVANCED FLOWER  
CAPITAL INC. and  
AFC AGENT LLC,**

**Defendants.**

**CIVIL ACTION NO. 3:25-CV-02789-ZHQ-JBD**

**STIPULATION AND *STATUS*  
*QUO* ORDER**

WHEREAS, on April 21, 2025, Plaintiffs Hayden Gateway LLC (“Hayden”) and Bloc Dispensary LLC (“Bloc”) (jointly, “Plaintiffs”), filed a Notice of Emergent Application by Petitioners for an Order to Show Cause with Temporary Restraints to be Converted to a Preliminary Injunction, supported by a Memorandum of Law and various Declarations and Exhibits (collectively, “Plaintiffs’ Motion for Order to Show Cause”), seeking the Court to order Defendants Advanced Flower Capital Inc. and AFC Agent LLC (jointly, “Defendants”) to cease seizing any of Plaintiffs’ assets or cash (beyond the permitted scheduled cash sweeps), and to cease any other attempted remedy for any alleged default;

WHEREAS, the Court has scheduled an evidentiary hearing for May 2, 2025, to resolve Plaintiffs’ Motion for Order to Show Cause [ECF No. 14];

WHEREAS, the parties have stipulated and agreed as follows:

1. Defendants will not seize any of Plaintiffs’ assets or cash (beyond the cash sweeps permitted by the 2024 Forbearance Agreement), initiate foreclosure proceedings, or seek to

any of Plaintiffs' assets, until the earlier of (a) the date the Court resolves Plaintiffs' Motion for Order to Show Cause or (b) May 12, 2025;

2. Defendants agree to file and serve any written opposition to the Plaintiffs' Motion for Order to Show Cause by 1:00 p.m. on April 30, 2025;

3. Plaintiffs agree to file and serve any written reply by 1:00 p.m. on May 1, 2025.

/s/ Jeffrey Kopczynski

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*Pro Hac Vice Applications Pending*

*Counsel for Plaintiffs*

SO ORDERED this 28th day of April 2025.

  
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THE HONORABLE ZAHID N. QURAISHI, U.S.D.J.